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Counsel for General Instrument Corporation  
doing business as the Home and Networks Mobility  
business of Motorola Inc.

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

In re:

CIRCUIT CITY STORES, INC., et al.,  
Debtors.

Chapter 11

Case No. 08-35653 (KRH)  
(Jointly Administered)

**PRELIMINARY RESPONSE OF GENERAL INSTRUMENT CORPORATION DOING  
BUSINESS AS THE HOME & NETWORKS MOBILITY BUSINESS OF MOTOROLA  
INC. TO DEBTORS' NINETEENTH OMNIBUS OBJECTION TO CLAIMS  
(RECLASSIFICATION OF CERTAIN MISCLASSIFIED CLAIMS TO GENERAL  
UNSECURED, NON-PRIORITY CLAIMS)**

General Instrument Corporation doing business as the Home and Networks Mobility  
business of Motorola Inc. ("Home & Networks"), by and through its undersigned counsel,  
submits its Preliminary Response (the "Preliminary Response") to the Debtors' Nineteenth  
Omnibus Objection to Claims (Reclassification of Certain Misclassified Claims to General  
Unsecured, Non-Priority Claims) (the "Objection"), and in support respectfully states as follows:

1. On or about January 29, 2009, Home & Networks filed a proof of claim against Debtor Circuit City Stores, Inc. for \$369,280.64, which is listed by the Debtors as claim number 7597 (the “Claim”). On or about June 22, 2009, the Debtors filed the Objection. Pursuant to the Objection, the Debtors seek to reclassify a \$50,000 secured claim under section 506(a) of the Bankruptcy Code to a general unsecured claim. Home & Networks objects to the relief requested in the Objection.

2. Home & Networks files this Preliminary Response in lieu of a formal pleading pursuant to the Debtors’ authorization to Home & Network’s counsel on July 8, 2009. Accordingly, Home & Networks reserves all rights with respect to the Claim and the right to supplement the Preliminary Response at a later date.

3. Contact information for Home & Networks is as follows:

General Instrument Corporation dba  
The Home & Networks Mobility business of Motorola, Inc.  
101 Tournament Drive  
Horsham, PA 19044  
ATTN: Angela Urban (215) 323-1760

WHEREFORE, Home & Networks respectfully requests that the Claim be excluded from any order approving the Objection and such other relief as is just and proper.

Date: July 15, 2009

**BUCHANAN INGERSOLL & ROONEY PC**

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Counsel to Counsel for General Instrument  
Corporation doing business as the Home and  
Networks Mobility business of Motorola Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing *Preliminary Response of General Instrument Corporation Doing Business As the Home & Networks Mobility Business of Motorola Inc. to Debtors' Nineteenth Omnibus Objection to Claims (Reclassification of Certain Misclassified Claims to General Unsecured, Non-Priority Claims)* was filed electronically with the court via the CM/ECF system on the 15th day of July, 2009 and first-class mail to the following:

Clerk of the Bankruptcy Court  
United States Bankruptcy Court  
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